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UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,	)	
	)	CASE NO. 2:15-CR-00212-JCM-NJK
Plaintiff,	)	
	)	
vs.	)	
	)	
CHARLES PARKIN,	)	
	)	
Defendant.	)	

**STIPULATION TO CONTINUE PLEA HEARING  
(First Request)**

IT IS HEREBY STIPULATED AND AGREED, between the United States of America, by and through its attorney, Nicholas A. Trutanich, United States Attorney, through Simon Kung, Assistant United States Attorney; and Defendant Charles Parkin, by and through his counsel, Russell E. Marsh, Esquire, Wright Marsh & Levy, that the Change of Plea Hearing currently scheduled for December 16, 2020, be vacated and set to a date and time convenient to this Court, but no sooner than 21 days from the current hearing date.

This stipulation is entered into for the following reasons:

1. This matter is currently set for a Change of Plea Hearing on December 16, 2020, at 10:00 a.m. (ECF Nos. 114, 117.)
2. Over the weekend of December 12-13, 2020, Mr. Parkin was hospitalized with severe bacterial pneumonia. He is home now but is still suffering from chest pain and breathing difficulties.

3. The parties agree to continue the Change of Plea Hearing for three weeks. Mr. Parkin is out of custody and agrees to the continuance.

4. Additionally, denial of this request for continuance could result in a miscarriage of justice.

5. The additional time requested by this Stipulation is made in good faith and not for purposes of delay.

6. This is the first request for a continuance of the Change of Plea Hearing.

Dated this 14th day of December, 2020.

Respectfully submitted:

WRIGHT MARSH & LEVY

NICHOLAS A. TRUTANICH  
UNITED STATES ATTORNEY

BY /s/ Russell E. Marsh  
RUSSELL E. MARSH, ESQUIRE  
Attorney for Defendant Parkin

BY /s/ Simon Kung  
SIMON KUNG  
Assistant U.S. Attorney

UNITED STATES DISTRICT COURT  
DISTRICT OF NEVADA

UNITED STATES OF AMERICA,  
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CHARLES PARKIN,  
Defendant.


CASE NO. 2:15-CR-00212-JCM-NJK

**ORDER**

Based on the Stipulation of the parties, the Change of Plea Hearing in this matter is hereby continued. The ends of justice served by granting said continuance outweigh the best interest of the public and the defendant in a hearing, since the failure to grant said continuance would be likely to result in a miscarriage of justice, and would deny the parties herein sufficient time and the opportunity within which to be able to effectively and thoroughly prepare for the hearing, taking into account the exercise of due diligence.

IS IT HEREBY ORDERED that the Change of Plea Hearing in the above-captioned matter currently scheduled for December 16, 2020, at 10:00 a.m., be vacated and continued to 1/6/2021 at 10:30 AM.

DATED: December 14, 2020.

  
JAMES C. MAHAN  
United States District Judge